

SHANKMAN LEONE

Mitchell L. Fraley, Esq. (Pro Hac Vice)
Florida Bar no.: 0132888
mfraley@shankmanleone.com
707 North Franklin Street, Fifth Floor
Tampa, Florida 33602
phone: 813.223.1099
fax: 813.223.1055

QUARLES & BRADY LLP

E. Joseph Connaughton (Bar No. 166765)
joe.connaughton@quarles.com
Morgan A. Chase (Bar No. 333573)
morgan.chase@quarles.com
101 W Broadway 9th Floor
San Diego, CA 92101
Tel. No. (619) 237-5200
Fax No. (619) 615-0700

Attorneys for Defendant ENCORE
GROUP (USA) LLC

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CRYSTAL TEKESTE,
an individual;

Plaintiff,

vs.

ENCORE GROUP (USA) LLC, a
Delaware limited liability company;
and DOES 1 - 50, inclusive,

Defendants.

Case No. 24-1267

**DEFENDANT'S NOTICE OF
SETTLEMENT**

PLEASE TAKE NOTICE that Defendant, ENCORE GROUPM (USA) LLC, by and
through its undersigned counsel, hereby gives notice that it has reached a settlement with Plaintiff,
CRYSTAL TEKESTE, in the above-styled cause, and that the Parties anticipate completing the
settlement documents within the next thirty days.

1 Dated: June 17, 2024,

2 Respectfully submitted,
3 **SHANKMAN LEONE**

4 By: /s/ Mitchell L. Fraley

5 Mitchell L. Fraley, Esq. (*Pro Hac Vice*)

6 Florida Bar no.: 0132888

7 mfraley@shankmanleone.com

8 707 North Franklin Street

9 Fifth Floor

10 Tampa, Florida 33602

11 phone: 813.223.1099

12 fax: 813.223.1055

13 **PROOF OF SERVICE**

14 At the time of service, I was over 18 years of age and not a party to this action. I am
15 employed in the County of Hillsborough, State of Florida. My business address is 707 N. Franklin
16 Street, Fifth Floor, Tampa, California 33602.

17 On June 17, 2024, I served true copies of the following document(s) described as:
18 **DEFENDANT'S NOTICE OF SETTLEMENT** on the interested parties in this action as follows:

19 Haroon Manjlai
20 Manjlai Law, PC
21 9431 Haven Avenue, Suite 100
22 Rancho Cucamonga, CA 91730
23 Telephone: (951) 268-4384
24 E-Mail: hm@manjlailaw.com

25 Attorneys for Plaintiff CRYSTAL TEKESTE

26 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s)
27 to be sent from e-mail address mfraley@shankmanleone.com to the persons at the e-mail addresses
28 listed in the Service List. I did not receive, within a reasonable time after the transmission, any
electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of State of Florida at the foregoing is true
and correct.

Executed on June 17, 2024, at Tampa, Florida

Mitchell Fraley

Mitchell Fraley